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18 *Attorneys for Defendant Joaquin Q. Atalig*

19
20 IN THE UNITED STATES DISTRICT COURT
21 FOR THE
22 NORTHERN MARIANA ISLANDS

23 DONGBU INSURANCE COMPANY, LTD.,) CIVIL ACTION NO. CV 08-0002
24 Plaintiff,)
25 vs.) CASE MANAGEMENT CONFERENCE
26 OKP (CNMI) CORPORATION AND) STATEMENT OF DEFENDANT
27 JOAQUIN Q. ATALIG,) JOAQUIN Q. ATALIG
28 Defendants.)

29
30 Defendant Joaquin Q. Atalig, by and through counsel, hereby submits his Case
31 Management Conference Statement pursuant to LR 16.2CJc2 as follows:
32
33 (a) **Service of process on parties not yet served.** All named parties were served.
34
35 (b) **Jurisdiction and venue.** The Court has jurisdiction pursuant to 28 U.S.C. § 1332(a)
36 because the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs,

1 and citizens of a State and a citizen or subject of a foreign state. This Court also has jurisdiction
2 pursuant to 28 U.S.C. § 2201 and FED.R.CIV.P. 57 with respect to declaratory judgments and
3 declaratory relief provided therein for the purpose of determining a question of actual
4 controversy between the parties.

Venue is proper in the United States District Court for the Northern Mariana Islands.

7 (e) **Track assignment.** Mr. Atalig agrees with the Court that this case should be
8 assigned to the Standard Track as defined in LR 16.2C(j).

12 (e) Anticipated or remaining discovery, including (1) limitation on discovery, (2)
13 and provisions for disclosure or discovery of electronically stored information, and, (3) any
14 agreements the parties reach for asserting claims of privilege or of protection as trial-
15 preparation material after production. The parties have yet to conduct any formal discovery
16 in this action.

18 (f) Further proceedings, including setting dates for discovery cut-off, pretrial and
19 trial. Mr. Atalig will be ready to discuss dates at the conference.

20 (g) Appropriateness of special procedures such as consolidation of actions for
21 discovery or pretrial, reference to a master or to arbitration or to the Judicial Panel or
22 Multidistrict Litigation, or application of the Manual for Complex Litigation. None.

24 (h) Modifications of the standard pretrial procedures specified by the Local Rules
25 on account of the relative simplicity or complexity of the action or proceeding. None.

26 (i) Settlement prospects. Mr. Atalig is amenable to a fair and reasonable settlement.

1 (j) Any other matter which may be conducive to the just, efficient and economical
2 determination of the proceeding, including the definition or limitation of issues. None at
3 this time.
4
5
6

7 Dated: April 24, 2008

Respectfully submitted,

8 O'CONNOR BERMAN DOTT & BANES

9 /s/
10 Michael W. Dotts, Esq. (F0150)
11 Attorneys for Plaintiff

12 Dated: April 24, 2008

13 LAW OFFICES OF RAMON K. QUICHOCHO, LLC

14 /s/
15 Ramon K. Quichocho, Esq. (F0243)
16 Attorney for Plaintiff